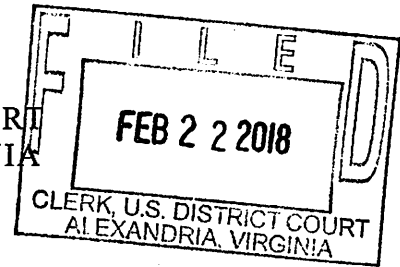


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

TENGIZ SYDYKOV

Case No. 1:18-mj-91-

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Gruchacz, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI") and am currently assigned to the National Security Group. I have 18 years of law enforcement experience. I have knowledge of the laws and regulations relating to the illegal exportation of weapons, technology, and other controlled commodities, as well as the federal criminal statutes that regulate and, in certain instances, prohibit the export of U.S. controlled commodities, including weapons, weapons systems, services, military equipment and technology. I am empowered by law to investigate and make arrests for violations of federal law, including the unlawful exportation of items listed on the United States Munitions List ("USML"), as specified in the Arms Export Control Act ("AECA"), 22 U.S.C. § 2778, and the International Traffic in Arms Regulations, 22 C.F.R. Parts 120 et. seq.

2. As a Special Agent with HSI, I am familiar with the federal laws relating to the unlawful export of licensable articles, technology, and commodities from the U.S. as specified and regulated by the U.S. Department of State, Directorate of Defense Trade Control ("DDTC"), the U.S. Department of Commerce, Bureau of Industry and Security ("BIS"), and the U.S. Department

of the Treasury, Office of Foreign Asset Controls (“OFAC”). I am also familiar with the interpretation and application of related laws and have previously assisted in the execution of numerous federal search and arrest warrants. As a Special Agent with HSI, I have received considerable training related to identifying the techniques, methods, and procedures employed by groups, organizations, companies, corporations, and individuals who violate U.S. laws. I make this affidavit in support of an application for a criminal complaint and arrest warrant for TENGIZ SYDYKOV.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of federal criminal laws have been committed, including 22 U.S.C. § 2778(b)(2) and (c) (AECA), 22 CFR 127.1 (International Traffic in Arms Regulations), and 18 U.S.C. § 554 (Conspiracy to Smuggle Goods from the United States), 18 U.S.C. § 371 (Conspiracy), § 1343 (Wire Fraud), § 1344 (Bank Fraud), § 1349 (Conspiracy to Commit Wire and Bank Fraud), and §§ 1956 and 1957 (Money Laundering).

RELEVANT STATUTES

5. *International Trafficking in Arms Regulations.* Pursuant to the authority under the AECA, the President of the United States is authorized to control the import and the export of defense articles and defense services. Furthermore, the President is authorized to designate those items which shall be considered defense articles and defense services and identify such articles on the USML. The AECA—specifically, 22 U.S.C. § 2778(c)—provides:

Any person who willfully violates any provision of this section, section 2779 of this title, a treaty referred to in subsection (j)(1)(C)(i), or any rule or regulation issued under this section or section 2779 of this title, including any rule or regulation issued to implement or enforce a treaty referred to in subsection (j)(1)(C)(i) or an implementing arrangement pursuant to such treaty, or who willfully, in a registration or license application or required report, makes any untrue statement of a material fact or omits to state a material fact required to be stated therein or necessary to make the statements therein not misleading, shall upon conviction be fined for each violation not more than \$1,000,000 or imprisoned not more than 20 years, or both.

6. *Conspiracy.* Title 18, United States Code, Section 371 provides, in relevant part, that if two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, then each shall be guilty of a federal offense.

7. *Wire Fraud.* Title 18, United States Code, Section 1343 provides, in relevant part, that whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire communication in interstate or foreign commerce, any writings or signals for the purpose of executing such scheme or artifice, shall be guilty of a federal offense. Title 18, United States Code, Section 1349 provides, in relevant part, that whoever attempts or conspires to commit wire fraud shall be guilty of a federal offense.

8. *Bank Fraud.* Title 18, United States Code, Section 1344 provides, in relevant part, that whoever knowingly executes, or attempts to execute, a scheme or artifice to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises, shall be guilty of a federal offense. Title 18, United States Code, Section 1349

provides, in relevant part, that whoever attempts or conspires to commit bank fraud shall be guilty of a federal offense.

9. *Money Laundering.* Title 18, United States Code, Section 1956 provides, in relevant part, that whoever transmits or transfers or attempts to transmit or transfer funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, or knowing that the monetary instrument or funds involved in the transmission or transfer represent the proceeds of some form of unlawful activity and knowing that such transmission or transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, shall be guilty of a federal offense. Title 18, United States Code, Section 1957 provides, in relevant part, that whoever knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from specified unlawful activity, shall be guilty of a federal offense.

10. *Smuggling goods from the United States.* Title 18, United States Code, Section 554 provides Whoever fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, shall be guilty of a federal offense.

THE CONSPIRACY

11. This investigation has revealed a conspiracy involving TENGIZ SYDYKOV, Eldar Rezvanov (“E REZVANOV”) and Chingiz Sydykov (“C SYDYKOV”) as well as others yet unknown, who are responsible for the wiring of funds from foreign bank accounts in Chechnya and elsewhere to U.S. bank accounts for the sole purpose of purchasing firearms, firearms parts such as Glock slides and barrels, and firearms accessories such as Glock and AK47 magazines. Numerous overt acts in furtherance of the conspiracy are detailed below.

12. TENGIZ SYDYKOV is a citizen of Kyrgyzstan with a pending application to become a naturalized United States Citizen. He has a valid Legal Permanent Resident (“LPR”) card. TENGIZ SYDYKOV uses email addresses TIWA.KRUT@GMAIL.COM (Search warrant authorized by The Honorable Magistrate Judge Nachmanoff on October 11, 2017) and T_SYDYKOV@YAHOO.COM (Search warrant authorized by The Honorable Magistrate Judge Davis on November 17, 2017). He has no approved or pending applications to export items on the USML or Commerce Control List nor does he have any pending or approved applications to become a Federal Firearms Licensed dealer (“FFL”). As an LPR, TENGIZ SYDYKOV is the only one known to the conspiracy who may legally purchase firearms. I believe that TENGIZ SYDYKOV is responsible for obtaining the controlled items and serving as the “money man.” According to bank statements, TENGIZ SYDYKOV has received wire transfers in increments of \$4,000 to \$4,900 in succession, to remain under the \$10,000 reporting threshold. Purchases of firearms or firearms parts are made soon after each wire transfers. TENGIZ SYDYKOV is currently the lease holder at 2601 Park Center Drive, #C1010, Alexandria, Virginia according to building management. His driver’s license lists this address as well. TENGIZ SYDYKOV has mail going to this address and lists this address on his immigration forms. Using a ruse phone

call, I spoke with TENGIZ SYDYKOV, who explained that he rents 2601 Park Center Drive, #C1010, Alexandria, Virginia and splits his time between there and his girlfriend's address of 5814 Norham Drive, Alexandria, Virginia. I am familiar with the appearance and voice of TENGIZ SYDYKOV from reviewing video of him picking up numerous Glock receivers from firearms dealers, and I have listened to recorded phone calls where TENGIZ SYDYKOV is making bulk Glock slide and barrel purchases from Glock Store Inc. I am also familiar with numerous purchase receipts where TENGIZ SYDYKOV has purchased firearms parts since in and around the middle of 2017.

13. E REZVANOV is a citizen of Kazakhstan and has a pending application with the United States for a protected status. E REZVANOV is responsible for the mail ordering of gun parts and the mailing of packages. E REZVANOV uses email accounts DMIR236@GMAIL.COM (Search warrant authorized by The Honorable Magistrate Judge Nachmanoff on October 11, 2017), SAIGAKZ12@GMAIL.COM, ELDAR.REZVANOV@GMAIL.COM, and KRG27.2012@GMAIL.COM (Search warrants authorized by The Honorable Magistrate Judge Davis on November 17, 2017). E REZVANOV provided 2601 Park Center Drive #C1010, Alexandria, Virginia as the primary address for his pending application with USCIS. E REZVANOV has received numerous packages containing firearms parts listed on the USML at this location. I interviewed the concierge desk manager at the apartment complex and provided him with a photo lineup. He immediately picked E REZVANOV out stating that every day E REZVANOV picks up packages addressed to him and others at apartment C1010. I have reviewed purchase receipts dating back to May 2015 where E REZVANOV is purchasing Glock parts. E REZVANOV's fingerprints were found on three boxes of seized gun parts (further discussed below in paragraphs 48-62).

14. C SYDYKOV is a citizen of Kyrgyzstan with no status in the United States. He has a valid visitor visa to enter the United States and has previously taken several trips to the United States. C SYDYKOV is responsible for the overseas organization and the coordinating with as yet unknown individuals in Chechnya and elsewhere and for wiring funds to United States bank accounts for the purpose of purchasing and receiving firearms and accessories in Chechnya. C SYDYKOV uses email account CHINGIZ83@GMAIL.COM (Search warrant authorized by The Honorable Magistrate Judge Anderson on November 30, 2017). C SYDYKOV is the older brother of co-conspirator TENGIZ SYDYKOV. C SYDYKOV lists 2601 Park Center Drive, #C1010, Alexandria Virginia as his destination address on his entry/exit immigration forms during his travel to the United States in June 2017. C SYDYKOV opened up bank accounts to further the conspiracy using 2601 Park Center Drive, #C1010, Alexandria Virginia in and around late spring 2016 (further discussed in paragraph 64 below). I believe that C SYDYKOV is responsible for obtaining orders and money overseas and sending it to his brother TENGIZ SYDYKOV.

FACTS ESTABLISHING PROBABLE CAUSE

15. This investigation has revealed that TENGIZ SYDYKOV has purchased at least 107 lower receivers for various Glock pistol models. He has also purchased Glock slides and barrels separately from gun brokers across the United States. Only the purchase of lower receivers is tracked. While the slides and barrels are serialized, they are not required to be tracked when the sale is made. I believe the reason TENGIZ SYDYKOV is purchasing lower receivers, slides and barrels separately is so he can build a firearm where the ballistics may be untraceable to him since the serial number of the Glock barrel sold to him is not recorded. The investigation has shown that contemporaneous to some of the sales, either a parcel was mailed

overseas, or an overseas flight was booked. The purchase of 107 receivers by someone without a gun business is indicative of illegal exports.

16. ITAR rules regarding the temporary export of weapons state: Port Directors of U.S. Customs and Border Protection shall permit U.S. Persons to export temporarily from the United States without a license not more than three non-automatic firearms in Category I(a) of § 121.1 of this subchapter and not more than 1,000 cartridges therefor, provided that: (1) A declaration by the U.S. person and an inspection by a customs officer is made; (2) The firearms and accompanying ammunition must be with the U.S. person's baggage or effects, whether accompanied or unaccompanied (but not mailed); and (3) They must be for that person's exclusive use and not for re-export or other transfer of ownership. See 22 CFR 123.17.

17. This exemption allows you take up to three such firearms, which must be non-automatic (meaning not fully automatic, such as semi-automatic). This same exemption allows you to take up to 1,000 rounds of ammunition for these firearms, under the same restrictions.

18. While "temporary" is not specifically defined insofar as we are aware, it certainly carries its normal meaning of "lasting for a limited time," and is not permanent.

19. Any permanent exports require a license from DDTC, in accordance with 22 U.S.C. 2778-2780 of the AECA. DDTC is charged with controlling the export and temporary import of defense articles and defense services covered by the USML.

20. The Bureau of Alcohol Tobacco and Firearms ("ATF") provided information to me regarding Glock slides and barrels that were purchased from Lucas Tactical in Illinois. The email address DMUR236@GMAIL.COM was listed on receipts in the sale of Glock slides by Lucas Tactical.

21. I contacted firearms dealer and interviewed the manager who stated that TENGIZ SYDYKOV stuck out because he was first contacted by an unknown Damir MUR asking for a quote for ten Glock 17 slides valued at \$400.00 each, 30 Glock 17 magazines valued at \$20.00 each and ten Glock cases valued at \$10.00 each both via email from DMUR236@GMAIL.COM and telephone. Within a few days he was then contacted by a person named Chingiz Sydykov, the brother of TENGIZ SYDYKOV, seeking to purchase ten Glock 17 slides valued at \$400.00 each, 30 Glock 17 magazines valued at \$20.00 each and ten Glock cases valued at \$10.00 each. This purchase was completed. The total for the purchases was \$5,002.00. I obtained copies of the invoices. Estimate #1006 was requested by "DAMIR MUR, Alexandria VA" on October 26, 2016. On November 1, 2016 invoice # 2547 was billed to "Chingiz Sydykov, 2601 Park Center Drive, apt C 1010, Alexandria, Virginia 22302. I have confirmed that TENGIZ SYDYKOV resides at this location.

22. A check of travel records for this period indicates that C SYDYKOV was not in the United States at the time of the purchase. I believe that TENGIZ SYDYKOV was using these other individuals' names to remain anonymous. An email chain regarding the purchase was retrieved by FFL Lucas and provided to me.

23. On or about November 1, 2016, at 12:39 p.m., an email was sent to FFL Lucas from email address DMUR236@GMAIL.COM asking "would you provide a deal if I buy 10 slides g17 g3. 20-30 magazines g17 17rd. 20 cases and one ADVANTAGE ARMS L.E 17-22 GEN 3 CONVERSION KIT."

24. No paperwork is required for the purchase of slides and barrels so there is no record of the serial numbers. The packages were sent to "Chingiz SYDYKOV" at 2601 Park Center DR #c1010, Alexandria Virginia, TENGIZ SYDYKOV's residence.

25. A search for exports indicates that four packages were sent by TENGIZ SYDYKOV on December 6 and 7, 2016, to Kyrgyzstan and Russia labeled "Household Goods" and "Plastic Sheets." Prior to the purchase of gun parts, TENGIZ SYDYKOV had never used the Postal Service to mail large parcels overseas. I believe TENGIZ SYDYKOV was waiting for additional purchases to arrive prior to sending the gun parts out of the country.

26. An ATF trace was submitted for TENGIZ SYDYKOV. It identified additional firearms purchases. On February 12, 2017, TENGIZ SYDYKOV purchased two FN Herstal 5.57 pistols from SSG Tactical, 610 Westwood Office Park, Fredericksburg, Virginia (FFL 15414817), serial numbers 386314036 and 386308409.

27. On May 10, 2017, TENGIZ SYDYKOV purchased twenty-four (24) Glock 17 AND 19 Gen 3 9MM pistols from "The Gun Dude" located at 412A West Broad Street, Falls Church, Virginia. The serial numbers are BBHF554, BBHF550, BBHF547, BBPY361, BBHF552, BBHE122, BBHF557, BBPY360, BBPY109, BBPY359, BBDD005, BBDD026, BBDD002, BBDD007, BBDD017, BCHE787, BBDD006, BBDD015, BBDD011, BBDD078, ARXC661(G19), BDVA609(G19), BDVA610(G19), BDVA611(G19).

28. Additional State Police checks indicate TENGIZ SYDYKOV made additional purchases on July 29, 2017, from Trophy Room Sports, located at 109 S Fairfax Street, Unit#5, Alexandria, Virginia and on August 2, 2017, from Sharp Shooters, located at 8194 M Terminal Road, Lorton, Virginia.

29. On October 5, 2017, HSI DC Counter Proliferation Investigations Center ("CPIC") obtained ATF form 4473 from Sharpshooters Small Arms Range Inc., located at 8194M Terminal Road, Lorton, Virginia 22079. On August 2, 2017, TENGIZ SYDYKOV

purchased a Desert Eagle .357 pistol indicating he is the end user of the firearm. TENGIZ SYDYKOV listed his address as 2601 Park Center Drive, #C1010, Alexandria, Virginia 22302.

30. I also obtained an additional ATF 4473 from "The Gun Dude" (out of business since August 2017) formerly located at 412A West Broad Street, Falls Church, Virginia 22046. On April 4, 2017, TENGIZ SYDYKOV purchased forty (40) Glock 17 Gen 3 receivers with the following serial numbers: BDPL954, BECW671, BECW625, BDKG978, BDKC276, BDKC275, BECW626, BECW676, BDWB161, BEAU767, BDKG983, BDKG984, BDKG986, BDKG979, BDKG988, BEFN934, BDKG987, BEFR361, BECW673, BCNA865, BCBM274, BDTN066, BDTN060, BDTN059, BDTN073, BDKR006, BDLA135, BDLA141, BDTN072, BDGV208, BDGV205, BDTN070, BDGV209, BDLA136, BDLA140, BDTN061, BDTN069, BDGV206, BCBM276, BDGV202 and two FNH Five Seven full pistols, serial numbers 386308410 and 386313605.

31. Travel reservations were checked for TENGIZ SYDYKOV and C SYDYKOV in relation to the gun purchases. TENGIZ SYDYKOV departed the United States on June 15, 2017, from Dulles International, aboard SU#105 bound for Kyrgyzstan and returned to JFK on July 1, 2017. It is not known if he took weapons out of the United States at this time; however, it is common for weapons traffickers to make reservations soon after the purchase to take the weapons to their customers overseas. Soon after he returned from Kyrgyzstan, he purchased the 24 Glocks from The Gun Dude.

32. On September 9, 2017, TENGIZ SYDYKOV departed the United States from Dulles Airport on a flight bound for Ukraine aboard LH #417. He returned on September 17, 2017. Prior to this flight, TENGIZ SYDYKOV purchased firearms from Sharpshooters, located at 8194 M Terminal Road, Lorton, Virginia; a desert Eagle .357 from The Trophy Room in

Fairfax, Virginia; and Glock receivers from The Gun Dude. Soon after his return trip, TENGIZ SYDYKOV made additional purchases from the Gun Dude.

33. I was notified by Nova Firearms on September 25, 2017, that TENGIZ SYDYKOV was supposed to pick up approximately 38 Glock receivers complete with the trigger mechanism. I spoke with management at Nova Firearms who stated that TENGIZ SYDYKOV was coming into the store, located at 412A West Broad Street, Falls Church, Virginia to fill out the ATF 4473 form and pick up the receivers. Management stated that she reported this transaction because she was suspicious of TENGIZ SYDYKOV.

34. According to NOVA Firearms management, THE GUN DUDE management spoke with TENGIZ SYDYKOV about the 64 previously purchased Glocks. He told management that he “ran a security company in Virginia.” He said the merchandise was for the business. Nova Firearms management also spoke with TENGIZ SYDYKOV when he came in to inquire about the purchase of 38 receivers and claimed that he and a friend “redesign and sell the redesigned gun pieces.” There was no reference to a security business. Nova Firearms management advised TENGIZ SYDYKOV that the sale of multiple firearms or the transport of firearms for export require licenses. TENGIZ SYDYKOV responded to her in the affirmative stating, “I know.” This conversation was audio and video recorded by the store. I have confirmed that TENGIZ SYDYKOV does not own or work for any security company nor has he registered or applied for any licenses to sell firearms or firearms components.

35. I obtained copies of the invoices for the purchase from Nova Firearms due to the fact that TENGIZ SYDYKOV ordered Glock receivers from multiple individuals via the internet and needed an FFL to have them shipped. According to the invoices provided by Nova Firearms, on September 20, 2017, TENGIZ SYDYKOV ordered four Glock 17, Gen 4 frames, serial

numbers ACHL127, ACHL128, ACHL134 and BFEL329 from GunBroker.Com. He listed his address as 5814 Norham Drive, Alexandria, Virginia and an email address as TIWA.KRUT@GMAIL.COM. As of November 2017, I have confirmed that TENGIZ SYDYKOV lives part-time at this location which is leased by who I believe is his current girlfriend. The phone number provided as part of the purchase is 703-509-XXXX. This phone number has been used on numerous other invoices. On January 12, 2018, I obtained a search warrant from Honorable Magistrate Judge John F. Anderson, to place a GPS tracker on TENGIZ SYDYKOV's Mercedes bearing Virginia registration VWA5867. On January 17, 2018, I observed this vehicle at 5814 Norham Drive, Alexandria Virginia at 0445 hrs. The GPS tracker was placed on the vehicle at this time. TENGIZ SYDYKOV has visited 2601 Park Center Drive, #C1010, Alexandria Virginia, numerous times while the GPS device has been reporting locations.

36. On September 19, 2017, TENGIZ SYDYKOV ordered Glock 17 Gen 4 frames, serial numbers BFCR624, BFCR626, BFCR623 and BDXF293 from the Glock Store located in San Diego, California. Again, he listed 5814 Norham Drive, Alexandria, Virginia and an email address as TIWA.KRUT@GMAIL.COM. The phone number provided is 703-509-XXXX.

37. On September 9, 2017, TENGIZ SYDYKOV ordered Glock 17 Gen 4 frames, serial numbers ACFX522, ACFX523 from Gillman Guns, LLC located in Illinois. Again, he provided the 5814 Norham Drive, Alexandria, Virginia, address and an email of TIWA.KRUT@GMAIL.COM. The phone number provided is 703-509-XXXX.

38. On September 8, 2017, TENGIZ SYDYKOV ordered 15 Glock 17 and 3 Glock 19 Gen 4 frames from Omaha Outdoors, located in Texas, serial numbers: YTZ832, BCVH267, BBDD009, BCPV136, BBRD216, BBPV408, BBHT292, BBDD168, BCVH264, BBRB848,

BBRC920, BDMF036, BCWX748, YYV078, BBDD075, YYV075, BFEL587, BDML415.

Again, TENGIZ SYDYKOV provided the 5814 Norham Drive, Alexandria, Virginia address and TIWA.KRUT@GMAIL.COM email address. The phone number provided was 703-509-XXXX.

39. On September 18, 2017, TENGIZ SYDYKOV ordered Glock 17 Gen 4 frames, serial numbers BDBB936, BDBB938, BDBB939, BDBB945, BDBB946, BEAM820, ABRW753 SHP800 and Glock 26 serial numbers BFNY434, BFNY435, from Ted Lundberg, an FFL in Utah. Again, he provided the 5814 Norham Drive, Alexandria, Virginia address and TIWA.KRUT@GMAIL.COM email address. The phone number provided was 703-509-XXXX.

40. TENGIZ SYDYKOV picked up all of the items from Nova Firearms on September 29, 2017. NOVA FIREARMS recorded the transaction and provided a copy to me. Copies of the form 4473s were obtained that TENGIZ SYDYKOV filled out. Question 11a asking if he is the end user is checked "yes." TENGIZ SYDYKOV has always checked "yes" as the end user for all of the Glock frames. It is unclear, aside from the illegal sale or export of them, why TENGIZ SYDYKOV would need 107 Glock receivers.

41. Every time SYDYKOV or REZVANOV purchased a firearm, they were required to sign ATF form 4473 which states: "The State Department or Commerce Department may require a firearms exporter to obtain a license prior to export. **Warning:** Any person who exports a firearm without proper authorization may be fined not more than \$1,000,000 and/or imprisoned for not more than 20 years. See 22 U.S.C. 2778(c)." (**bold in original**) Purchase receipts signed by SYDYKOV and REZVANOV also notified them that the firearms could not be resold by the ultimate consignee. Finally, in emails receipts received by REZVANOV and SYDYKOV many state that the commodities purchased are ITAR controlled and that diversion is contrary to U.S. law.

PURCHASES LINKING EMAIL ACCOUNTS

42. Email correspondence detailing sales with other firearm dealers was discovered in a court-authorized search of SYDYKOV's and REZVANOV's's email accounts. Among these sales, which are just a sampling and are in no way the complete, were sales linking T_SYDYKOV@YAHOO.COM to the conspiracy: On October 4, 2017, SAIGAKZ12@GMAIL.COM forwarded an order from Brownells, Inc. to TIWA.KRUT@GMAIL.COM. On December 8, 2016, SAIGAKZ12@GMAIL.COM sent TIWA.KRUT@GMAIL.COM an order from Omaha Outdoors. On October 6, 2015, SAIGAKZ12@GMAIL.COM was used for a Glock conversion unit by E REZVANOV. On March 23, 2017, E REZVANOV used SAIGAKZ12@GMAIL.COM to purchase Glock firearm parts in the amount of \$3980.87. As explained above, the sales receipts and emails contain disclaimers regarding license requirements.

43. On January 22, 2017, I listened to an audio call of E REZVANOV placing an order for 17 complete Glock uppers. In the audio the sales person asks if the purchaser wants to use SAIGAKZ12@GMAIL.COM for the sale. The buyer responded: "No use TIWA.KRUT@GMAIL.COM."

44. During a search of DMUR236@GMAIL.COM an email was discovered dated July 5, 2015, from ELDAR.REZVANOV@GMAIL.COM expressing the interest in opening a company specializing in weapons sales and accessories. Around 12:17 p.m. on July 5, 2015, E REZVANOV sent a firearms dealer, Zvi Zedman an email requesting dealer price lists for firearms and firearm parts, particularly Glock barrels. In the email chain, E REZVANOV using SAIGAKZ12@GMAIL.COM, says: "I would like to become a dealer, would you guys assist me

with web site and with all stuff which is need to start up right? My target is post-soviet countries....” The email is signed “Eldar.” The name listed next to SAIGAKZ12@GMAIL.COM in the header is “BRUS LEE.” On July 6, 2017, at 3:26 p.m., SAIGAKZ12@GMAIL.COM forwarded the email chain to ELDAR.REZVANOV@GMAIL.COM.

45. On January 9, 2016, DMUR236@GMAIL.COM forwarded an internet chat to SAIGAKZ12@GMAIL.COM. The chat is with a sales representative for Incorporated.Com. The participants are “EL” and “Kelly.” I believe that “EL” is short for Eldar. EL identifies himself using the fake name “Anton ISHUTIN.” During the chat “EL” tells “Kelly” that he wants to set up a business to sell weapons accessories and pistol parts asking how to establish an LLC. “EL” says his email is SAIGAKZ12@GMAIL.COM. “Ashton” provides a known former address for E REZVANOV in West Palm Beach, Florida. “Kelly” tells “EL” that she came up with a website description of “selling weapons and accessories online.” “EL” responds “there you go.”

46. On May 25, 2016, the email address SAIGAKZ12@GMAIL.COM was used to place an order by E REZVANOV to 2601 Park Center Drive, Alexandria, Virginia 22302 from Lanbo’s Armory. On July 26, 2016, the email address KRG27.2012@GMAIL.COM was used to place an order to the same address.

47. Midway USA, a firearms parts dealer, has KRG27.2012@GMAIL.COM on file for sending items to 2601 Park Center Drive, C1010, Alexandria, Virginia.

48. On October 6, 2015, SAIGAKZ12@GMAIL.COM was used to discuss a Glock conversion unit by TENGIZ SYDYKOV. On March 23, 2017, TENGIZ SYDYKOV used SAIGAKZ12@GMAIL.COM to arrange the purchase of Glock firearm parts in the amount of

\$3,980.87. On January 22, 2017, I listened to an audio call of TENGIZ SYDYKOV placing an order for 17 complete Glock uppers. The audio recording revealed the sales person asking if the purchaser wants to use KRG27.2012@GMAIL.COM for the sale. The person buying tells the sales person “No use TIWA.KRUT@GMAIL.COM.”

49. TENGIZ SYDYKOV is the lease holder at 2601 Park Center Drive, C1010, Alexandria, Virginia 22302, in the Eastern District of Virginia, according to public records. I believe that E REZVANOV also resides here and pays TENGIZ SYDYKOV rent. I believe that TENGIZ SYDYKOV splits his time between 5418 Norham Drive, Alexandria, Virginia and 2601 Park Center Drive, C1010, Alexandria, Virginia 22302.

SEIZURE OF PACKAGES LINKED TO CONSPIRACY

50. On October 30, 2017, your affiant was notified by partner agency United States Postal Inspection Service (“USPIS”) regarding a shipment that E REZVANOV was attempting at the Park Fairfax Post Office, located at 3682 King Street, Alexandria, Virginia. E REZVANOV was identified by postal employees in a photo lineup after the seizure of these packages (discussed in paragraph 76 below). The postal clerk at this post office was previously interviewed and stated he/she could remember this individual due to the fact that he is always mailing heavy packages. TENGIZ SYDYKOV and E. REZVANOV had recently purchased a large amount of firearms as well as Glock receivers, barrels and slides from multiple sources.

51. Evidence recovered in SYDYKOV’S and REZVANOV’S email accounts indicates they are involved in a conspiracy to illegally export USML items from the United States utilizing the U.S. Postal System. SYDYKOV and REZVANOV have previous USPS shipments that are contemporaneous to firearms and firearm parts purchases. These shipments have gone to former Soviet Republics.

52. After being notified by HSI DC that TENGIZ SYDYKOV and REZVANOV were suspected of illegally exporting ITAR controlled items, USPIS Inspector Colin Spence went to the Park Fairfax Post Office on October 30, 2017, and saw the packages REZVANOV paid for and put into the mail stream for export from the United States. Inspector Spence described the boxes as heavy. Although REZVANOV was the one mailing these particular packages, the package had a return address that REZVANOV had no connection to, and the name listed in the return address area of the package was not his. Additionally, the Customs Declaration described the contents as "Utensils," among other things. REZVANOV paid \$420 in cash to ship the package, which is atypical of large dollar transactions today. Typically, such high amounts are paid for using credit or debit cards.

53. Package number one is identified as a cardboard box weighing 30 pounds 10 ounces bearing Customs Declaration CX340036449US and was addressed to:

Bislan MEZHIEV
6 Vtoroy Pereulok Bagratia @2
Grozny, Chechnya, Russia 364015

Return Address:
Dayana SVETOVA
1533 Mount Eagle Place #1533
Alexandria, VA 22302
703-447-1594

The description of contents listed on the Customs Declaration is:
Vacuum Containers Qty 5 Value \$120
Kydex Qty 4 Value \$20
Earmuff Qty 15 Value \$25

54. Package number two is identified as a cardboard box weighing 36 pounds 15.6 ounces bearing Customs Declaration CX130510985US and was addressed to:

Hadishat MEZHIEVA
19 Pyaty Pereulok Gudermeskiy

Grozny, Chechnya, Russia 364047

Return Address:

Dayana SVETOVA

1533 Mount Eagle Place #1533

Alexandria, VA 22302

703-447-1594

The description of contents listed on the Customs Declaration is:

Car Seat Covers Qty 4 Value \$90

Metal Springs Qty 10 Value \$40

Kydex Qty 5 Value \$40

55. Public records indicate that 1533 Mount Eagle Place is a brick townhouse. There is no record of a person by the name of Dayana SVETOVA residing there. The property is listed for sale on numerous real estate websites and there is a realtor's sign on the property.

56. A court-authorized search of TENGIZ SYDYKOV and co-conspirator REZVANOV's email accounts revealed have multiple Kydex holsters purchases.

57. I believe SYDYKOV AND REZVANOV are attempting to hide their identity to avoid detection if the illegal contents of the packages be exposed. (1) They are paying the high price of postage with cash, claiming to ship relatively inexpensive household utensils. (2) They do not list their name and true addresses in the return address portion of the shipping label. (3) They appear to be using vacant homes for sale for the return address. I believe this is so they can retrieve any packages that are returned without risking detection by using their true name and address. Given all of these factors, I requested permission from ICE Office of Principal Legal Advisor ("OPLA") to perform an international outbound inspection.

58. As REZVANOV placed both packages into the mail stream at the Park Fairfax Post Office where they would have been placed among thousands of international packages being dispatched all over the world daily through the International Gateway at JFK Airport for export. As the packages were placed into the mail stream, REZVANOV could not get them back

to add or remove items. The Park Fairfax Post Office is that last reliable and reasonable point for 100% inspection of the package.

59. For these reasons, the Park Fairfax Post Office becomes the functional equivalent of the United States Border for these packages. A border search was performed. Numerous Glock and AK-47 magazines, gun parts and accessories and other ITAR-controlled items were found inside the shipments. These items were seized. A review of bank statements and purchase history in the email accounts indicates that both TENGIZ SYDYKOV and REZVANOV are making the purchases of firearms and firearms parts, however REZVANOV is the person who mailed the seized packages.

60. On November 2, 2017, HSI DC CPIC was notified by partner agency USPIS that REZVANOV had shipped a package at the Park Fairfax Post Office, located at 3682 King Street, Alexandria, Virginia 22302. The postal clerk at this post office was previously interviewed and stated that he/she could remember REZVANOV due to the fact that he was always mailing heavy packages. TENGIZ SYDYKOV and REZVANOV had recently purchased a large amount of firearms as well as Glock receivers, barrels and slides from multiple sources. The package was also paid for in cash in the amount of \$189.10.

61. Package number three is identified as a cardboard box weighing 36 pounds 15.6 ounces bearing Customs Declaration CX324413693US and was addressed to:

Adantuev ANVAR
17 Selskaya St
Grozny, Chechnya, Russia 364015

Return Address:
Shults ROMAN
3309 Wyndham Cir #1172
Alexandria, VA 22302
571-457-6480

The description of contents listed on the Customs Declaration is:

Construction tool Qty 3 Value \$55

Car Part Qty 3 Value \$80

Kydex Qty 5 Value \$30

62. TENGIZ SYDYKOV and co-conspirator REZVANOV have made multiple purchases of Kydex holsters as discovered in their target email accounts.

63. REZVANOV placed the package into the mail stream at the Park Fairfax Post Office where it would have been consolidated with packages from the east coast of the United States and ultimately placed among thousands of international packages being dispatched all over the world through JFK Airport. Once REZVANOV placed the packages into the mail stream, REZVANOV could not get them back to add or remove items and similarly attempting to relocate the packages at a later time for inspection would prove risky due to the sheer volume of international mail and the speed at which it must clear outbound inspection. HSI DC consulted with OPLA and determined the Park Fairfax Post Office is that last reasonable point for 100% inspection on the package.

64. For these reasons, the Park Fairfax Post Office becomes the functional equivalent of the United States Border for these packages. A border search was conducted on the packages. Inside, gun barrels were taped to spatulas, and gun slides were taped to wheels in an effort to conceal them by making them appear to be casters for kitchen cabinets.

FINGERPRINT AND HANDWRITING ANALYSIS

65. The packages seized by your affiant on October 30, 2017 and November 2, 2017, contained black plastic supports used to make shipping boxes more rigid. These partitions were analyzed by the DHS Forensic Lab. Fingerprints were compared to prints on file with DHS from the alien files of TENGIZ SYDYKOV and E REZVANOV. Latent fingerprints for E REZVANOV were found on the black plastic partitions. Customs Declarations taped to the

seized packages were handwritten and contained a signature. Those declarations had handwriting that was similar to the handwriting on the asylum application for E REZVANOV. The DHS Forensic Lab stated that the signature on the declaration and asylum application were pictorially similar to each other.

C SYDYKOV WIRE TRANSFERS

66. On November 17, 2017, your affiant reviewed Bank of America statements for account 435039997759 (opened August 8, 2016) and 435039833376 (opened July 14, 2016) which were opened by C SYDYKOV during trips to the United States. C SYDYKOV took a trip to the United States between April 4, 2016 and September 19, 2016, as well as January 21, 2017 and June 29, 2017. Both statements list 2601 Park Center Drive #C1010, Alexandria Virginia as the mailing address.

67. A review of the statements from account ending in 3376 revealed numerous transfers between TENGIZ SYDYKOV and C SYDYKOV as well as E REZVANOV. On May 2, 2017, a \$4,950 wire transfer from Chechnya was sent to an account ending in 3376. Immediately following that deposit, numerous payments were made into accounts belonging to TENGIZ SYDYKOV and E REZVANOV. Following these transfers, TENGIZ SYDYKOV purchased numerous GLOCK receivers on May 10 and 19, 2017. The original wire transfer originated from Alieva Madina SAYTHASANOV.

68. Another wire transfer from Alieva Madina SAYTHASANOV using the account ending 3376 occurred on April 3, 2017. Immediately following that deposit, C SYDYKOV sent TENGIZ SYDYKOV numerous disbursements into his account. On April 4, 2017, TENGIZ SYDYKOV purchased 42 GLOCK receivers.

69. Between March 2 and 20, 2017, the account ending 3376 received two transfers of \$4,950 from Alieva Madina SAYTHASANOV, and \$4,900 from Makalov Umar MURATOVICH.

70. The account ending in 3376 received \$4,950 on October 31, 2016, from MEZHIEV BESLAN MOGDANOVIC; \$2,950 on September 27, 2016, from CHUPALAEV RASHID SAIT-KHA; and \$4,950 on October 4, 2016, from ALIEVA MADINA SAJKHASANO. On October 17, 2016, a purchase was made from LAMBO's armory for GLOCK slides and barrels from the account ending 3376. There are numerous other wire transfers contained in the case file. During the length of stay for the two trips C SYDYKOV made to the United States, over \$101,000 were deposited into his account.

TENGIZ SYDYKOV WIRE TRANSFERS

71. On November 17, 2017, HSI DC CPIC agents reviewed Bank of America statements for account 226006009960 and 435040605823, both opened by TENGIZ SYDYKOV. Between November 2016 and August 2017, over \$276,160 was deposited into the account ending in 9960. Between December 2016 and September 2017, over \$83,000 was deposited into account ending 5823. The billing statements for both accounts were going to 2601 Park Center Drive, #C1010, Alexandria, Virginia until approximately June 2017 when TENGIZ SYDYKOV switched the billing address to 5814 Norham Drive, Alexandria, Virginia.

72. Numerous wire transfers from individuals in CHECHNYA were deposited into the account ending in 9960 which were followed by purchases of firearms parts as well as disbursements to E Rezvanov, C SYDYKOV and others involved in the conspiracy.

73. The names identified as remitters are as follows:

Chingiz SYDYKOV
Akhmad Shamsudinov BATAEV

Madina Saytkhsano ALIEVA
Dumitru CHIRIAC
Alberd Kazbekovich ALIEV
Chukin Askarovich TIMUR
Rashid Sait-Kha CHUPALEV
Adelya Nurlano SABITOVA
Asel Daironova ARUNOVA
Umar Muratovich MAKALOV
Beslan Mogdanovic MEZHIEV

74. On October 31, 2017 and November 1, 2017, HSI DC seized packages destined for Chechnya to individuals named MEZHIEV.

PHOTO LINEUP AND USE OF FALSE ADDRESSES

75. On November 7, 2017, your affiant conducted surveillance at the locations listed as the return address for the packages seized on October 30, 2017 and November 2, 2017.

76. Location #1, 1533 Mount Eagle Place, #1533, Alexandria, Virginia 22302 is listed for sale by Redfin Realty. No activity was observed at this location. It is believed this location was listed as a return address due to the fact that if the package were undeliverable it would be left on the front stoop and retrieved by members of the conspiracy.

77. Location #2, 3309 Wyndham Circle, #1172, Alexandria, Virginia, is an interior apartment/condo that is also listed for sale. It is located directly around the corner from the address for REZVANOV and SYDYKOV where many of the firearm packages were sent: 2601 Park Center Drive #C1010, Alexandria, Virginia.

78. Agents interviewed the mail clerk at 2601 Park Center Drive, Alexandria, Virginia. He immediately recognized a photo of E REZVANOV and TENGIZ SYDYKOV as individuals who retrieve packages from him "on an almost daily basis." He showed agents two packages that were delivered that day (November 7, 2017). Both were addressed to Mihai

VASLUIAN, a previously unknown coconspirator. The packages were sent from BW MADDOX LLC, which is a firearms dealer in Texas. According to travel records VASLUIAN has not been in the United States since November 2016. I believe that TENGIZ SYDYKOV, E REZVANOV and C SYDYKOV are using multiple names to conceal their connection to the packages.

79. A photo array was shown to a post office employee at 3682 King Street, Alexandria, Virginia 22302. The post office employee immediately picked out E REZVANOV as the individual who had shipped the boxes previously seized by your affiant. The post office employee stated E REZVANOV routinely mails heavy packages and always pays cash.

80. A review of email account ELDAR.REZVANOV@GMAIL.COM contained an internet search history. Beginning on November 14, 2017, E REZVANOV began searching for “Post Office customer service” and “Jamaica USPS.” The seized packages had false scans created by USPS to make it look like the packages were sent to Jamaica, New York, the International Mail Hub. E REZVANOV googled “my item stuck in Jamaica, NY post office package got stuck.” E REZVANOV also checked on the same label numbers for the customs declarations on the packages seized. On October 30, 2017, E REZVANOV googled “car seat covers” probably to determine a value. Car seat covers is one of the items incorrectly declared on the customs declaration to conceal its true contents. E REZVANOV also googled, “22302 real estate” as well as Zillow and Redfin. Your affiant believes this is how he identified the homes for sale that he labeled on the seized packages as a return address.

81. On January 4, 2018, I reviewed evidence obtained from email account CHINGIZ83@GMAIL.COM, previously sworn out before the honorable Magistrate Judge Anderson on November 30, 2017. On October 30, 2017, C SYDYKOV has Google search

history for “USPS Tracking.” This is the same date that the seized packages were detained by USPS. On October 26, 2017, C SYDYKOV did a Google search for “documents for a license to sell weapons.” Between October 2017 and November 2017, C SYDYKOV conducted multiple searches for “Glock Parts” and “Glock Assembly.”

ABSENCE OF EXPORT LICENSES

82. Database checks available to and conducted by the affiant, revealed no export licenses for TENGIZ SYDYKOV, E REZVANOV and C SYDYKOV. Also, DDTC, has reviewed its records and determined there is no record of TENGIZ SYDYKOV ever applying for, or obtaining, a license to export any commodity from the United States.

DISCOVERY OF STORAGE CONTAINER

83. A review of TENGIZ SYDYKOV bank statements list automatic payments to “FT KNOX STORAGE.” I went to Fort Knox Self Storage located at 2933 Telestar Court, Falls Church, Virginia, and Fort Know Self Storage confirmed TENGIZ SYDYKOV has a 5-foot by 15-foot storage garage. I believe he may be using it in furtherance of this conspiracy. My training and experience has taught me that the large quantities of purchases may require additional storage locations to conceal the illegal activity and potential of being identified if apartment maintenance or others were to go into apartment #C1010. On the application for the storage locker TENGIZ SYDYKOV lists 2601 Park Center Drive, #C1010, Alexandria, Virginia as his address.

CONCLUSION

84. Based on the following, I believe there is probable cause to obtain an arrest warrant for TENGIZ SYDYKOV for violations related to 22 U.S.C. § 2778(b)(2) and (c) (the Arms Export Control Act), 22 CFR 127.1 (International Traffic in Arms Regulations), 18 U.S.C.

